WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW
930 RICHLAND STREET
P.O. BOX 8416
COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY JOHN M.S. HOEFER ELIZABETH ZECK* RANDOLPH R. LOWELL K. CHAD BURGESS NOAH M. HICKS II** M. MCMULLEN TAYLOR BENJAMIN P. MUSTIAN

AREA CODE 803 TELEPHONE 252-3300 TELECOPIER 256-8062

August 28, 2006

The Honorable Charles L.A. Terreni Chief Clerk/Administrator **Public Service Commission of South Carolina** Post Office Box 11649 Columbia, South Carolina 29211

RE: Application of Carolina Water Service, Inc. for adjustment of rates and charges for the provision of water and sewer service; Docket 2006-92-WS

Dear Mr. Terreni:

Pursuant to 26 S.C. Code Ann. Regs. 103-850.A and the Hearing Officer's ruling issued in the above-referenced Docket on August 25, 2006, Carolina Water Service, Inc. ("CWS") requests that the Commission issue a subpoena to Mr. Don Long to appear at the deposition to be held in this matter, The deposition will take place on August 31, 2006 at 10:00 a.m., at the McKeown Law Firm, 26 West Liberty Street, York, South Carolina 29745.

Additionally, CWS requests that the Commission issue a subpoena duces tecum compelling Mr. Long to produce the documents identified on the Proposed Subpoena attached herein. At the public hearing held in Lake Wylie, York County South Carolina, on June 12, 2006, Mr. Long made a Power Point presentation to the Commission regarding the above referenced docket. Additionally, as acknowledged by the Hearing Officer's directive issued in this matter on August 25, 2006, Mr. Long has expressed his intention to make an additional presentation during the hearing held in this matter on September 7 and 8, 2006. CWS seeks to establish facts relating to Mr. Long's various assertions made in his presentation on June 12, 2006. Additionally, CWS asserts that it is entitled to conduct discovery regarding the June 12, 2006, presentation, any presentation or testimony he intends to present at the hearing scheduled to be held before the Commission on September 7 and 8, 2006, and any information or documentation pertaining thereto.

^{*}ALSO ADMITTED IN TX
**ALSO ADMITTED IN VA

I have attached hereto a Proposed Subpoena for Deposition and Subpoena Duces Tecum. Thank you for your assistance with this matter. Please let me know if you have any questions.

Sincerely,

WILLOUGHBY & HOEFER, P.A.

John M.S. Hoefer

Enclosures

cc: C. Lessie Hammonds, Esquire Shannon B. Hudson, Esquire

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2006-92-W/S

IN RE:)	
Application of Carolina Water Service, Inc. for adjustment of rates and charges for the provision of water and sewer service.))))	SUBPOENA FOR DEPOSITION AND SUBPOENA DUCES TECUM

TO: Mr. Don Long 14 Sunrise Point Court Clover, SC 29710-9232

You are hereby strictly and firmly enjoined that, all business being laid aside, and excuses ceasing, you appear personally at the place, date and time specified below to be deposed regarding the above-captioned matter.

Place: McKeown Law Firm 26 West Liberty Street

York, South Carolina 29745

Date: August 31, 2006

Time: 10:00 a.m.

You are further commanded to bring with you and there produce in evidence the following records:

- 1) a copy of the Power Point presentation and any associated documents, in both electronic and paper format, used by you at the public hearing held by the South Carolina Public Service Commission ("Commission") in Lake Wylie, York County, South Carolina, on June 12, 2006;
- 2) all workpapers, calculations, charts, records and other documents used to develop the presentation made by you at the public hearing held by the Commission in Lake Wylie, York County, South Carolina, on June 12, 2006;

- 3) all workpapers, calculations, charts, records and other documents you intend to present to the Commission at the hearing scheduled to be held in the Commission's Hearing Room, Synergy Business Park, 101 Executive Center Dr., Columbia, S.C, on September 7 and 8, 2006;
- 4) a copy of the Power Point presentation and any associated documents, in both electronic and paper format, you intend to present to the Commission at the hearing scheduled to be held in the Commission's Hearing Room, Synergy Business Park, 101 Executive Center Dr., Columbia, S.C, on September 7 and 8, 2006; and
- 5) all workpapers, calculations, charts, records and other documents used to develop any presentation you intend to present to the Commission at the hearing scheduled to be held in the Commission's Hearing Room, Synergy Business Park, 101 Executive Center Dr., Columbia, S.C, on September 7 and 8, 2006.

Witness, Charles L.A. Terreni, Chief Clerk/Administrator, Columbia, South Carolina, this 28th day of August, in the year of our Lord Two Thousand Six.

Charles L.A. Terreni Chief Clerk/Administrator Public Service Commission of South Carolina